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CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

June 1, 1998

SUBJECT: Comments on the Draft Programmatic EIR/EIS.

Attention: Rick Breitenbach

The following comments are written out of concern over flooding of property and residences in Southern Sacramento County. The areas of concern are locally called the Franklin Pond and the Beach Stone Lake area. The Franklin Pond area lies east of Franklin Boulevard and north of the Mokelumne River. The Beach Stone Lake area lies on either side of Interstate I-5 between Lambert Road at the south and Sacramento City limits at the north. Approximately 25,000 acres in the area were flooded in January 1997. There are approximately 290 residences plus several dairy farms in the area. The area is not protected by levees.

High flows on the Cosumnes-Mokelumne Rivers in 1986, 1997 and 1998 flooded this area. The record stage in the Franklin Pond occurred in 1997.

Downstream of our area Reclamation Districts have provided protection to historically flooded area's by constructing levees. The historic record shows channel capacity between the levees will not allow flood flows to pass without substantially increasing water surface elevations. This increase in water surface elevation effects flooding for many miles upstream of the levees. In the case of the Franklin Pond-Beach Stone Lake area, the general land elevation is below the current levee height of the downstream Reclamation Districts. The downstream levee height determine the maximum water surface elevation of the Franklin Pond-Beach Stone Lake area. A proposal of the CALFED program is to raise these levees to the PL 84-99 standard. If the levees are raised without increasing channel capacity, it will increase the flood problem for this upstream area.

Sacramento County is enrolled in the National Flood Insurance Program as administered by FEMA. The County is required to permit activities that increase water surface elevations. Sacramento County has modeled the streams in its County and determined that three Reclamation District have levees critical to water surface elevations (see attached).

In recent years the State of California has encouraged construction of ever higher Reclamation District levees and in fact has financed much of the construction. The record stage in the Franklin Pond area in 1997 was only possible

after the downstream levees were raised following the 1986 flood. The State of California participated both financially and physically in the post 1986 levee improvement effort.

Although CALFED understands this flood problem, it must be recognized that to raise, strengthen and improve the levee protection for the Reclamation Districts without improving conveyance is unacceptable. Much of the upstream area was not in the natural floodplain and we do not accept to be made the flood retardation basin for up and downstream development.

I thank you for your time in this matter. If any of the above is unclear or you need additional information, please give me a call at 916-684-2711.

Sincerely,

A handwritten signature in cursive script, appearing to read 'W. J. Hoppe', written in dark ink.

Walter Hoppe